

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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INVENTIV HEALTH CONSULTING, )  
INC., )

Plaintiff, )

v. )

Civil Action No. 17-10410-NMG

EQUITAS LIFE SCIENCES, LLC, et al. )

Defendants. )

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**DEFENDANTS' MOTION TO TRANSFER VENUE AND OPPOSITION TO MOTION  
FOR EXPEDITED DISCOVERY**

Defendants Equitas Life Sciences, LLC, Alan D. French, Jr., Priya Gogia, Summer Atkinson and Jason Debasitis (collectively, the “Defendants”) respectfully move this Court, pursuant to 28 U.S.C. § 1404(a), to transfer the above-captioned action to the United States District Court for the Eastern District of North Carolina. For the reasons set forth in the accompanying memorandum, the Court should transfer this Action to the Eastern District of North Carolina.

Furthermore, at the time of removal of the case to this Court, Plaintiff’s Motion for Leave to Serve Expedited Discovery was pending with the Massachusetts Superior Court. The accompanying memorandum contains Defendants’ opposition to Plaintiff’s request for expedited discovery.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Defendants respectfully request oral argument on this Motion to Transfer and Opposition to Motion for Expedited Discovery.

Respectfully submitted,

EQUITAS LIFE SCIENCES, LLC, ALAN D.  
FRENCH, JR., PRIYA GOGIA, SUMMER  
ATKINSON and JASON DEBASITIS,  
By their attorneys,

/s/ Robert G. Young

Timothy P. Van Dyck (BBO #548347)

Robert G. Young (BBO #650541)

Timothy H. Powell (BBO #688434)

BOWDITCH & DEWEY, LLP

175 Crossing Boulevard, Suite 500

Framingham, MA 01702

Telephone: 617.757.6537

Facsimile: 508.929.3137

tvandyck@bowditch.com

ryoung@bowditch.com

tpowell@bowditch.com

Date: March 13, 2017

LOCAL RULE 7.1(A)(2) CERTIFICATION

I hereby certify that counsel for Plaintiff has conferred and has attempted in good faith to resolve or narrow the issue presented in this Motion.

/s/ Robert G. Young

Robert G. Young

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 13, 2017.

/s/ Robert G. Young

Robert G. Young